

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) **Chapter 11**
)
W.R. Grace & Co., et al.,) **Case No. 01-01139 (JKF)**
) **(Jointly Administered)**
)
Debtors.)

**Attachments to Memorandum in Support of the Claimants' Motion to Exclude
Dr. R.J. Lee's Opinion on Cleavage Fragments**

Darrell W. Scott, Esq.
Burke D. Jackowich, Esq.
Lukins & Annis, PS
717 W. Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
Facsimile: (509) 747-2323
ADDITIONAL SPECIAL COUNSEL

Edward J. Westbrook, Esq.
Robert M. Turkewitz, Esq.
James L. Ward, Esq.
Robert S. Wood, Esq.
Richardson, Patrick, Westbrook & Brickman
1037 Chuck Dawley Blvd., Building A
Mount Pleasant, SC 29464
Telephone: (843) 727-6513
Facsimile: (843) 727-6688
ZAI CLAIMANTS' SPECIAL COUNSEL

William D. Sullivan, Esq.
Charles Brown, Esq.
Eluzufon Auston Reardon Tarlov & Mondell
300 Delaware Avenue, Suite 1700
P.O. Box 1630
Wilmington, DE 19899
Telephone: (302) 428-3181
Facsimile: (302) 777-7244
COUNSEL FOR THE ZONOLITE CLAIMANTS,
BARBANTI, BUSCH, PREBIL, AND PRICE

Dated: July 7, 2003

TABLE OF CONTENTS

Exhibit

- 1 Excerpts from Morton Corn Deposition (May 29, 2003)
- 2 R.J. Lee Report (Apr. 15, 2003)
- 3 Excerpts from OSHA Proposed Asbestos Standard (1992)
- 4 Excerpts from R. J. Lee Deposition (June 6, 2003)
- 5 Ambient Air – Determination of Asbestos Fibers – Direct Transfer Transmission Electron Microscopy Method, Number 10312, International Standards Organization (1995)
- 6 Determination of Cleavage/Asbestiforms, R.J. Lee flow chart (Aug. 31, 2001)
- 7 Ann Wylie, Habit of Asbestiform Amphiboles: Implications for the Analysis of Bulk Samples, Advances in Environmental Measurement Methods for Asbestos, ASTM STP 1342 (M.E. Beard and H.L. Rooks, eds. 2000)
- 8 R.J. Lee, et al., Asbestiform and Nonasbestiform Mineral Growth Habit and Their Relationship to Cancer Studies (Apr. 2003)
- 9 J. C. McDonald, et al., Cohort Study of Mortality of Vermiculite Miners Exposed to Tremolite, British J. of Ind. Med., 43:436-44 (1986)
- 10 J. C. McDonald, et al., Health of Vermiculite Workers Exposed to Trace Amounts of Fibrous Tremolite, British J. of Ind. Med., 45:630-34 (1988)
- 11 Asbestos Strategies, Lessons Learned About Management and the Use of Asbestos, Global Environment & Technology Foundation (Apr. 21, 2003)
- 12 Grace draft response to an inquiry from the Consumer Products Safety Commission (Apr. 24, 1979)
- 13 Memorandum from E. S. Wood to C. E. Brookes, et al. (May 24, 1977)
- 14 Letter from H. A. Eschenbach to A. Harvey, R.T. Vanderbilt Company (May 12, 1983)
- 15 Julie Yang, Chemistry of Vermiculite and Asbestos (Sept. 16, 1983)

16 Excerpts from Julie Yang deposition in United States v. W.R. Grace & Co. (Aug. 21, 2002)

17 R. J. Lee Group Project Report. Polarized Light Microscopy Worksheet for Asbestos Analysis of Bulk Samples (June 26, 2002)

18 Julie Yang, Characterization and Preparation of Respirable Sized Tremolite Fiber and Vermiculite for Animal Studies (Apr. 8, 1976)

19 Memorandum from J. W. Wolter to Grace file (Oct. 5, 1976)

20 OSHA, Polarized Light Microscopy of Asbestos, Method ID-191 (1992)

21 William Longo Affidavit

22 W. J. Campbell, et al., Selected Silicate Minerals and Their Asbestiform Varieties, Bureau of Mines Information Circular 8751 (1977)

23 R. L. Perkins & B. W. Harvey, Method for the Determination of Asbestos in Bulk Building Materials, EPA/600/R-93/116, Table 2-2 (July 1993)

24 Excerpts from Edward Ilgren Deposition (May 22, 2003)

25 W. J. Campbell, et al., Relationship of Mineral Habit to Size Characteristics for Tremolite Cleavage Fragments and Fibers, Bureau of Mines Report of Investigations 8367 (1979)

26 R. J. Lee, et al., Considerations in the Analysis and Definition of Asbestos Using Electron Microscopy, National Bureau of Standards Special Publication 619 (Mar. 1982)

27 Letter from W. R. Grace to OSHA (May 24, 1984)

28 R. J. Lee Report in United States v. W. R. Grace & Co. (July 29, 2002)

29 EPA Memorandum from Christopher P. Weis to Paul Peronard (May 31, 2002)

30 EPA's Response to Comments Received on the Second Supplement to the Export/Screening Plant Administrative Record, United States v. W. R. Grace & Co. Administrative Record Document 2002165

31 Order in United States v. W. R. Grace & Co. (Dec. 19, 2002)

32 EPA Summary On-Site Audit Report, R.J. Lee Group, Inc. (May 1, 2001)

33

EPA Memorandum from Michael B. Cook to Superfund Regional Managers (June 19, 2003)